

KSC/02.13.23
JDM/AE: USAO#2019R00281

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

KRISTIE PARKER,

CRIMINAL NO.

(Conspiracy to Distribute and Dispense
Controlled Substances, 21 U.S.C. § 846;
Forfeiture)

SAG 23-0192

INFORMATION

COUNT 1

(Conspiracy to Distribute and Dispense Oxycodone)

The United States Attorney for the District of Maryland charges that:

From in or about January 2017 to in or about January 2021, in the District of Maryland,
the defendant

KRISTIE PARKER,

did knowingly and willfully combine, conspire, confederate, and agree with others known and
unknown to knowingly, intentionally, and unlawfully distribute and possess with the intent to
distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II
controlled substance, knowingly outside the scope of professional practice and not for a
legitimate medical purpose, in violation of Title 21, United States Code, Section 841(a)(1).
21 U.S.C. § 846.

FORFEITURE ALLEGATIONS

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 981(a)(1)(C), 21 U.S.C. § 853, and 28 U.S.C. § 2461 in the event of the defendant's conviction under Count 1 of this Information.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant,

KRISTIE PARKER

shall forfeit to the United States of America:

a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and

b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s).

3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)

21 U.S.C. § 853

28 U.S.C. § 2461(c)

Fed. R. Crim. P. 32.2(a)

Erek L. Barron by **JASON MEDINGER**
Digitally signed by
JASON MEDINGER
Date: 2023.05.28
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EREK L. BARRON
UNITED STATES ATTORNEY